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**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

**SAN FRANCISCO DIVISION**

JASMEN HOLLOWAY, AMY GARCIA,  
CHERYL CHAPPEL, ERIC  
BLACKSHER, JESSICA TREAS,  
LAWRENCE SANTIAGO, JR.,  
MUEMBO MUANZA, MAURICE  
CALHOUN, NICHOLAS DIXON and  
SUSAN MYERS-SNYDER, on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

BEST BUY CO., INC., BEST BUY  
STORES L.P.

Defendant.

**Case No. C 05-05056 PJH (MEJ)**

[Assigned for all purposes to the Honorable  
Phyllis J. Hamilton, United States District  
Judge]

**STIPULATION AND ORDER RE  
REDACTIONS TO BEST BUY'S  
FORTHCOMING DOCUMENT  
PRODUCTION**

Action filed: December 8, 2005

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1 WHEREAS Best Buy Co., Inc. and Best Buy Stores L.P. (collectively “Best Buy”) and  
2 Plaintiffs previously sought Court resolution of a discovery dispute over the appropriate scope of  
3 redactions to personnel files requested by Plaintiffs and produced by Best Buy;

4 WHEREAS on August 24, 2006, the Court found, *inter alia*, that Best Buy’s employees’  
5 privacy interests are protected by the protective order in this action;

6 WHEREAS the Court also found that Best Buy could redact social security numbers,  
7 those portions of the records related to medical information, and financial information unrelated  
8 to employee compensation;

9 WHEREAS on September 5, 2006, after an *in camera* review of the documents at issue,  
10 the Court found that Best Buy could redact from its production: (1) family emergency contact  
11 information; (2) family information from Group Benefits Applications; and (3) could refrain from  
12 producing two credit card applications that contain Best Buy customer information;

13 WHEREAS Best Buy informed Plaintiffs that Best Buy plans to notice depositions for  
14 seven current and former Best Buy employees; and

15 WHEREAS on December 11, 2006 Plaintiffs served Best Buy with a Sixth Request for  
16 Production of Documents seeking, *inter alia*, all documents concerning these seven current and  
17 former Best Buy employees.

18 Therefore, the parties agree that good cause exists and therefore stipulate as follows:

- 19 1. The privacy interests of Best Buy’s employees whose information is contained in  
20 Best Buy’s forthcoming production of documents is adequately protected by the  
21 protective order in this action;
- 22 2. Best Buy may redact social security numbers, medical information, and financial  
23 information unrelated to employee compensation that the Court previously ruled  
24 could be redacted from Best Buy employees’ personnel files
- 25 3. Best Buy may also refrain from producing credit card applications containing  
26 sensitive private customer information.

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4. This Stipulation does not encompass documents concerning any of the named Plaintiffs in this lawsuit, including Eric Blacksher, Maurice Calhoun, Cheryl Chappel, Nicholas Dixon, Amy Garcia, Jasmen Holloway, Muembo Muanza, Susan Myers-Snyder, Lawrence Santiago, Jr., and Jessica Treas.

DATED: January 18, 2007

**ROBINS, KAPLAN, MILLER & CIRESI L.L.P.**

By: /S/ Benjamin M. Weiss  
Benjamin M. Weiss

**MORGAN, LEWIS & BOCKIUS LLP**

George A. Stohner  
Melinda S. Riechert

**ATTORNEYS FOR DEFENDANTS  
BEST BUY COMPANY, INC. AND  
BEST BUY STORES, L.P.**

DATED: January 18, 2007

**LIEFF, CABRASER, HEIMANN &  
BERNSTEIN, LLP**

By: /S/ Kelly M. Dermody  
Kelly M. Dermody

**ATTORNEYS FOR PLAINTIFFS  
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JR., MUEMBO MUANZA, MAURICE  
CALHOUN, NICHOLAS DIXON AND SUSAN  
MYERS-SNYDER**

**IT IS SO ORDERED.**

DATED: January 19, 2007



[illegible]

On January 18, 2007, I served the foregoing document described as **STIPULATION AND ORDER RE REDACTIONS TO BEST BUY'S FORTHCOMING DOCUMENT PRODUCTION** on the interested parties in this action by placing a true and correct copy thereof enclosed in a sealed envelope addressed as follows:

Camilla Louisa Roberson  
Schneider & Wallace  
180 Montgomery Street  
Suite 2000  
San Francisco, CA 94104

**[X] BY MAIL:** I caused such envelope to be deposited in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid.

I am "readily familiar" with this firm's practice of collection and processing correspondence for mailing. It is deposited with U.S. postal service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

**BY FEDERAL EXPRESS - OVERNIGHT:** I caused such envelope to be deposited in a box or other facility regularly maintained by Federal Express in an envelope or package designated by Federal Express with delivery fees paid.

**[[ BY FACSIMILE:** I served a true copy of the document(s) described on all parties to this action by facsimile transmission, and the transmission was reported as complete and without error. Facsimile transmissions were sent and addressed as stated above.

**[[ BY PERSONAL SERVICE:** I caused such envelope to be delivered by hand to the offices of the addressees.

**[X]** (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction service was made.

Executed on January 18, 2007 at Los Angeles, California.

~~SILVIA GREEN~~